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March 13, 2007

FEDERAL EXPRESS

United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

**Re: Delphi Corporation, et al.
Case No. 05-16436**

No Disk

Dear Court Clerk:

Enclosed please find the Response of Zeller Electric of Buffalo, Inc. to the Ninth Omnibus Claims Objection together with proof of service and a diskette containing the Response and proof of service in PDF format.

By way of copy of this letter, I am serving copies of the Response in paper format to Delphi Corporation, debtors' counsel and to the Honorable Robert D. Drain, United States Bankruptcy Judge.

Please return a time-stamped copy of the Response to me in the prepaid envelope enclosed

Thank you for your consideration.

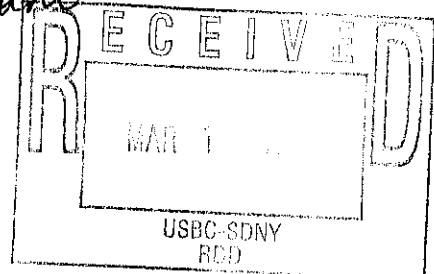
Very truly yours,

WOODS OVIATT GILMAN LLP

Eileen A. Solimano

Eileen A. Solimano
Paralegal

EAS/plm
Enclosures



March 13, 2007
Page 2

cc: Delphi Corporation
Attention: General Counsel
5725 Delphi Drive
Troy, Michigan 48098

Skadden, Arps, Slate, Meagher & Flom LLP
Attention: John William Butler, Jr., Esq.,
John K. Lyons, Esq., Joseph N. Wharton, Esq.
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606

Honorable Robert D. Drain ✓
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 610
New York, New York 10004

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Case No. 05-16436

RESPONSE TO NINTH OMNIBUS CLAIMS OBJECTION

Creditor, Zeller Electric of Buffalo, Inc., by and through its attorneys, Woods Oviatt Gilman LLP, for its Response to the Debtors' Ninth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. §502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims not Reflected on Debtors' Books and Records, (C) Untimely Claims, and (D) Claims Subject to Modification ("Ninth Omnibus Claims Objection"), alleges as follows:

1. On or about October 8, 2005, Delphi Corporation and other captioned debtors (collectively referred to as "Debtors") filed a petition in bankruptcy under Chapter 11 of the Bankruptcy Code.

2. Prior to October 8, 2005, Zeller Electric of Buffalo, Inc. (Zeller of Buffalo) sold certain goods to Delphi Automotive Systems LLC. These goods were never paid for by Debtors.

3. On or about July 27, 2006, Zeller of Buffalo filed its Proof of Claim against Delphi Automotive Systems LLC in the amount of \$994.04. This Proof of Claim included copies of invoices for goods sold by Zeller of Buffalo and is annexed hereto as ***Exhibit A***.

4. On or about February 15, 2007, Debtors filed the Ninth Omnibus Claims Objection.

5. In the Ninth Omnibus Claims Objection, Debtors argue Zeller of Buffalo's claim should be reduced to \$252.00.

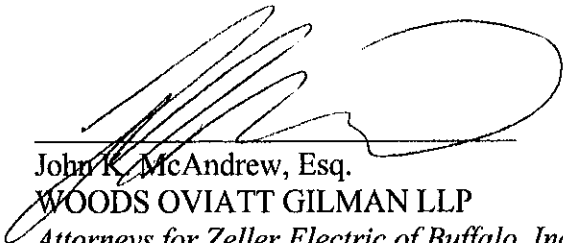
6. Debtors provide no specific reason for modifying Zeller of Buffalo's claim. Rather, Debtors merely state in the Ninth Omnibus Claims Objection that the claim is a claim subject to modification and provide six generic reasons applicable to hundreds of claims objected to.

7. Debtors' have offered no proof or even any specific allegation to substantiate or support their allegation that Zeller of Buffalo's claim is subject to modification. The Debtors' unsubstantiated and general allegations are insufficient to provide any basis for a determination that the claim of Zeller of Buffalo is subject to modification as alleged by the Debtors.

8. Zeller of Buffalo has, in contrast, offered as evidence three unpaid invoices to support its claim for \$994.04 (see attachment to Proof of Claim annexed hereto as *Exhibit A*). The three invoices supporting the claim of Zeller of Buffalo remain unpaid and were all debts of Delphi Automotive Systems, LLC (the debtor in Case No. 05-44640).

9. Therefore, Zeller of Buffalo requests the full amount of its claim in the sum of \$994.04 be allowed.

DATED: March 13, 2007
Rochester, New York



John K. McAndrew, Esq.
WOODS OVIATT GILMAN LLP
Attorneys for Zeller Electric of Buffalo, Inc.
700 Crossroads Building
2 State Street
Rochester, New York 14614
585.987.2800
jmcandrew@woodsoviatt.com

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
PROOF OF CLAIM**

NAME OF DEBTOR: DELPHI AUTOMOTIVE SYSTEMS LLC	CASE NO.: 05-44640
CHAPTER 11	

Check here if this claim () replaces or () amends a previously filed claim dated:

Check here if: () address differs from the address on the envelope sent by Court; () you never received any notice from the Court on this case; () you are aware of anyone else filing a proof of claim relating to your claim (attach copy of statement giving particulars)

CREDITOR INFORMATION

Name Creditor: ZELLER ELECTRIC OF BUFFALO, INC.

Name and Address of Where Notices Should be Sent:

WOODS OVIATT GILMAN LLP
Attn: John K. McAndrew, Esq.
700 Crossroads Building
2 State Street
Rochester, New York 14614

Telephone Number: 585.987.2800

CLAIM INFORMATION

1. Basis for Claim: goods sold
2. Date Debt Incurred: 4/4/05 – 9/13/05
If court judgment, date obtained: n/a
3. Classification of Claim:

Unsecured Nonpriority Claim \$994.04
4. **Total Amount of Claim at Time Case Filed: \$994.04**
5. Attached to this claim: Schedule of Unpaid Invoices with copies of invoices

CERTIFICATION

The undersigned certifies under penalty of perjury that the debtor named above is indebted to the claimant in the amount shown, that there is no security for the debt other than stated above or in an attachment to this form, that no unmatured interest is included, that all payments on this claim have been credited and deducted for the purpose of making this proof of claim and that the undersigned is authorized to make this claim.

Dated: July 27, 2006

ZELLER ELECTRIC OF BUFFALO, INC.

By:


John K. McAndrew, as agent

ZELLER ELECTRIC OF BUFFALO, INC.
SCHEDULE OF UNPAID INVOICES

<u>Invoice No.:</u>	<u>Purchase Order No.:</u>	<u>Goods Delivered:</u>	<u>Amount Due:</u>
510221	LPS90615	4/4/05	\$337.04
516979	LPB01468	5/24/05	\$405.00
532073	LPS98848	9/13/05	<u>\$252.00</u>
Total Due			\$994.04

INVOICE

a division of Zeller Corporation

Zeller Electric of Buffalo

1675 Niagara Street, Buffalo, NY 14207-3106
 Ph: (716) 873-1300 Fax (716) 873-8623 www.zellercorp.com
REMIT TO: PO Box 13436, Rochester, NY 14613

Invoice#: 510221
 Taker: DBM
 Page: 1
 Invoice Date: 04/04/05

SOLD-TO

SHIP-TO

B00216
 DELPHI HARRISON THERMAL
 AUTOMOTIVE COMPONENTS GROUP
 PO BOX 1550
 FLINT, MI 48501-1550

PL2B7
 DELPHI HARRISON THERMAL
 PLANT 2, BLDG 7, S.E. DOCK#5
 200 UPPER MOUNTAIN RD
 LOCKPORT, NY 14094

If Zeller Buffalo can be
 of any further service please
 call us at (716) 873-1300
 Thank you,
 DAN McDONALD

05-44481-rdd Doc 7328 Filed 03/15/07 Entered 03/19/07 16:03:15 Main Document

Customer PO#	Ship Via	Job Number	Terms	Freight	Confirm#	Ship Date	Requested		
LPS90615	TOM Z -PAT L.		1% 10 NET 30	COLLECT	387187	04/04/05	ASAP		
Ln	Total Ordered	Qty Curr	Qty Ship	Qty B/O	Item & Description	Vendor	Promise	Price	Extended Price
0001	2	2	2	0	774730 PNOZX4/24VDC SPECIAL PRICE TO MATCH WRONG PART ON SO # 374439 LN # 2 SEE CRS # 15060 FOR OFF SETTING CREDIT PAT TO HAND DEL. TO JIM JACKETT 439-2297	PILZ		168.52E	337.04
0002									
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0008									

Your Account Salesperson is: PAT LOCKWOOD

SUBTOTAL 337.04

INVOICE TOTAL 337.04

A penalty of 1 1/2% per month will be charged on any invoices not paid within 30 days

07/24/06 12:11 LDH

INVOCT Rev E

INVOICE

a division of Zeller Corporation

Zeller Electric of Buffalo

1675 Niagara Street, Buffalo, NY 14207-3106
Ph: (716) 873-1300 Fax (716) 873-8623 www.zellercorp.com

REMIT TO: PO Box 13436, Rochester, NY 14613

SOLD-TO

SHIP-TO

B00216

PL2B7

DELPHI HARRISON THERMAL
AUTOMOTIVE COMPONENTS GROUP
PO BOX 1550
FLINT, MI 48501-1550

DELPHI HARRISON THERMAL
PLANT 2, BLDG 7, S.E. DOCK#5
200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094

If Zeller Buffalo can be
of any further service please
call us at (716) 873-1300
Thank you,
SCOTT BUDDIE

Invoice#: 516979
Taker: SKB
Page: 1
Invoice Date: 05/23/05

Customer PO#	Ship Via	Job Number	Terms	Freight	Confirm#	Ship Date	Requested		
LPB01468	UPS CONSIGNEE	LPS94871	1% 10 NET 30	COLLECT	387386	05/23/05	ASAP		
Ln	Total Ordered	Qty Curr	Qty Ship	Qty B/O	Item & Description	Vendor	Promise	Price	Extended Price
001	1	1	1	0	GJL36040			405.00E	405.00
002					DE2, MOLDED CASE CIRCUIT BREAK	SQD			
003					* UPS TRACKING # *				
					1Z1246020347977887 05/23/05				

Your Account Salesperson is: PAT LOCKWOOD

A penalty of 1 1/2% per month will be charged on any invoices not paid within 30 days

07/24/0612:11 LDH



This is in response to your request for delivery information concerning the shipment listed below.

Signed by:

HEWITSON

[illegible]

Sincerely,
United Parcel Service

<https://wwwapps.ups.com/WebTracking/processRequest>

7/24/2006

Zeller Electric of Buffalo**INVOICE**
a division of Zeller Corporation1675 Niagara Street, Buffalo, NY 14207-3106
Ph: (716) 873-1300 Fax (716) 873-8623 www.zellercorp.com
REMIT TO: PO Box 13436, Rochester, NY 14613Invoice#: 532073
Taker: SKB
Page: 1
Invoice Date: 09/12/05**SOLD-TO****SHIP-TO**

B00216

CODE5

DELPHI HARRISON THERMAL
AUTOMOTIVE COMPONENTS GROUP
PO BOX 1550
FLINT, MI 48501-1550DELPHI HARRISON THERMAL SYSTEM
PLANT 5, DEPT. 733, BLDG. 8
200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094If Zeller Buffalo can be
of any further service please
call us at (716) 873-1300Thank you,
SCOTT BUDDIE

Customer PO#	Ship Via	Job Number	Terms	Freight	Confirm#	Ship Date	Requested
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LPS98848 UPS-CONSIGNEE

1% 10 NET 30

COLLECT

401427

09/12/05

ASAP

Ln	Total Ordered	Qty Curr	Qty Ship	Qty B/O	Item & Description	Vendor	Promise	Price Unit	Extended Price
001	12	12	12	0	A9.25 CPI, THERMAL UNIT PR730574/001	SQD		14.00E	168.00
002					PR730574/001				
003	6	6	6	0	A1.86 CPI, THERMAL UNIT PR730574/002	SQD		14.00E	84.00
004					PR730574/002				
005					* UPS TRACKING # *				
006					121246020347972702				
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Your Account Salesperson is: PAT LOCKWOOD

SUBTOTAL 252.00

A penalty of 1 1/2% per month will be charged on any invoices not paid within 30 days

07/24/0612:11 LDH

INVOICE TOTAL 252.00

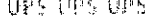


Dear Customer,

This is in response to your request for delivery information concerning the shipment listed below.

Tracking Number: 1Z 124 602 03 4797 270 2
Service Type: GROUND
Delivered on: 09/13/2005 9:19 A.M.
Delivered to: BLDG 8 HARRISON 37003
 200 UPPER MOUNTAIN RD
 LOCKPORT, NY, US 14094

Signed by: UHRICH

Signed by:  UTHMANIYAH

Location: RECEIVER

Thank you for giving us this opportunity to serve you.

Sincerely,
United Parcel Service

Tracking results provided by UPS: 07/24/2006 12:28 P.M. Eastern Time (USA)